

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN WILSON,

Plaintiff,

-v-

FEDERAL BUREAU OF INVESTIGATION,

Defendant.

No. 20 Civ. 10324 (LAK) (SDA)

DECLARATION OF TARA SCHWARTZ

Tara Schwartz, pursuant to the provisions of 28 U.S.C. § 1746, declares under penalty of perjury, as follows:

1. I am an Assistant United States Attorney in the office of Damian Williams, United States Attorney for the Southern District of New York, attorney for defendant Federal Bureau of Investigation (“FBI”). I am the attorney assigned to this matter, and familiar with the proceedings herein. I make this declaration on information and belief in support of the FBI’s opposition to Plaintiff’s motion for attorneys’ fees and costs brought pursuant to Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(a)(4)(E).

2. Attached hereto as Exhibit A is a true and correct copy of side-by-side comparisons of five pages of documents that the FBI produced on April 2, 2021, after this litigation was filed, with versions of the documents that had been produced to Plaintiff on September 25, 2014, in response to his March 25, 2014 FOIA request. The documents on the left side show the versions that were produced to Plaintiff on September 25, 2014. The documents on the right side show the versions that were produced to Plaintiff on April 2, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 25, 2022
New York, New York

/s/ *Tara Schwartz*
TARA SCHWARTZ